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American Honda Motor Co., Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Nicholas Longo and Jibin
Thomas, On Behalf of Themselves
and All Others Similarly
Situating,

Plaintiffs,

v.

AMERICAN HONDA MOTOR CO., INC.,
and MICHELIN NORTH AMERICA,
INC.,

Defendants.

Case No.:07-CIV-9339 (CLB) (GAY)

**NOTICE OF MOTION TO STAY
PROCEEDINGS PENDING A DECISION
BY THE JUDICIAL PANEL ON
MULTIDISTRICT LITIGATION**

Daniel R. Lapinski
WILETNZ, GOLDMAN & SPITZER, P.A.
110 William Street
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New York, New York 10038

COUNSEL:

PLEASE TAKE NOTICE that on January 4, 2008, or as soon
before that date as the Court may permit, Greenbaum, Rowe, Smith
& Davis, LLP, attorneys for defendant, American Honda Motor Co.,
Inc. ("AHM"), shall apply to the United States District Court
for the Southern District of New York, for an Order staying

proceedings in this matter pending a decision by the Judicial Panel on Multidistrict Litigation;

PLEASE TAKE FURTHER NOTICE that the within motion is supported by the Memorandum of Law filed by Michelin North America, Inc., in support of its motion to stay, and AHM's motion should be granted for the reasons stated therein;

PLEASE TAKE FURTHER NOTICE that this motion is accompanied by a proposed form of Order; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

GREENBAUM, ROWE, SMITH & DAVIS LLP
Attorneys for Defendant,
American Honda Motor Co., Inc.

By 
ROBERT M. GOODMAN

Dated: December 7, 2007

CERTIFICATE OF SERVICE

C. BRIAN KORNBREK hereby certifies as follows:

1. I am an Attorney-at-Law of the State of New Jersey and a partner of the law firm of Greenbaum, Rowe, Smith & Davis LLP, attorneys for defendant, American Honda Motor Co., Inc., in the above matter.

2. On the date indicated below, I caused this Notice of Motion to Stay, and proposed form of order to be filed via Electronic Filing.

3. On the date indicated below, the following received a copy of this service via Electronic Filing:

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Attorneys for Defendant Michelin North America, Inc.

via electronic filing.

4. I hereby certify that the foregoing statements made by me are true to the best of my knowledge and belief. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.



C. BRIAN KORNBREK

DATED: December 7, 2007